

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

Case No. 1:18-op-45090

THE BLACKFEET TRIBE OF THE
BLACKFEET INDIAN RESERVATION,

Plaintiff,

vs.

AMERISOURCEBERGEN DRUG
CORPORATION, CARDINAL HEALTH,
INC., McKESSON CORPORATION,
PURDUE PHARMA L.P., PURDUE
PHARMA, INC., THE PURDUE FREDERICK
COMPANY, INC., TEVA
PHARMACEUTICAL INDUSTRIES, LTD.,
TEVA PHARMACEUTICALS USA, INC.,
CEPHALON, INC., JOHNSON & JOHNSON,
JANSSEN PHARMACEUTICALS, INC.
ORTHO-MCNEIL-JANSSEN
PHARMACEUTICALS, INC. n/k/a JANSSEN
PHARMACEUTICALS, INC., JANSSEN
PHARMACEUTICA INC. n/k/a JANSSEN
PHARMACEUTICALS, INC., NORAMCO,
INC., ENDO HEALTH SOLUTIONS INC.,
ENDO PHARMACEUTICALS, INC., PAR
PHARMACEUTICAL, INC., PAR
PHARMACEUTICAL COMPANIES, INC.,
ALLERGAN PLC f/k/a ACTAVIS PLC,
ALLERGAN FINANCE LLC, f/k/a ACTAVIS,
INC., f/k/a WATSON PHARMACEUTICALS,
INC., WATSON LABORATORIES, INC.,
ACTAVIS LLC, ACTAVIS PHARMA, INC.
f/k/a WATSON PHARMA, INC.,
MALLINCKRODT PLC, MALLINCKRODT

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DEFENDANT NORAMCO, INC.'S
ANSWER TO CORRECTED FIRST
AMENDED COMPLAINT**

LLC., SPECGX LLC, INSYS
THERAPEUTICS, INC., CVS PHARMACY,
INC., CVS INDIANA, L.L.C., WALMART
INC. f/k/a WAL-MART STORES, INC.,
WALGREEN CO., WALGREEN ARIZONA
DRUG CO., ADVANTAGE LOGISTICS,
ALBERTSON'S LLC, ANDA
PHARMACEUTICALS, INC., ASSOCIATED
PHARMACIES, INC., DAKOTA DRUG, INC.,
and SMITH'S FOOD & DRUG CENTERS,
INC. d/b/a PEYTON'S PHOENIX,

Defendants.

**DEFENDANT NORMACO, INC.'S ANSWER TO CORRECTED FIRST AMENDED
COMPLAINT, AFFIRMATIVE DEFENSES, AND JURY DEMAND**

Defendant Noramco, Inc. (“Noramco”) hereby files its Answer, Affirmative Defenses, and Jury Demand in response to Plaintiff’s Corrected First Amended Complaint and Jury Demand (the “Complaint”) in the above-referenced action and, in support, respectfully states as follows:

RESPONSES TO ALLEGATIONS IN NUMBERED PARAGRAPHS

Answering the numbered Paragraphs of the Complaint, Noramco states as follows:

1. Noramco admits that the Plaintiff listed in the Complaint brings this action against the Defendants listed in the Complaint. Noramco specifically denies, however, that it is a proper defendant in this action. Noramco, a company referenced in the Complaint as a former subsidiary of Johnson & Johnson, does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiff is entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1.

2. Noramco admits only that opioids are pain-reducing medications. Except as thus stated, denied.

3. Denied.

4. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 4 and can neither admit nor deny the same.

5. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 5 and can neither admit nor deny the same.

6. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 6 and can neither admit nor deny the same.

7. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 7 and can neither admit nor deny the same.

8. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 8 and can neither admit nor deny the same.

9. Noramco specifically denies that it is a proper defendant in this action and that it in any way contributed to the opioid crisis. Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiff is entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 9.

10. Denied.

11. Denied.

12. As to the fourth and fifth sentences in Paragraph 12, in which Plaintiff alleges, “Today, as many as 1 in 4 patients who receive prescription opioids for chronic pain in a primary care setting struggles with addiction. And as of 2017, overdose deaths involving prescription opioids were five times higher than they were in 1999,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, denied.

13. Noramco denies the allegations in the first and second sentences of Paragraph 13. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 and can neither admit nor deny the same.

14. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 and can neither admit nor deny the same.

15. Denied.

16. Answering the first two sentences of Paragraph 16, in which Plaintiff alleges, “As millions became addicted to opioids, ‘pill mills,’ often styled as ‘pain clinics,’ sprouted nationwide and rogue prescribers stepped in to supply prescriptions for non-medical use. These pill mills, typically under the auspices of licensed medical professionals, issue high volumes of opioid prescriptions under the guise of medical treatment,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 16.

17. Denied.

18. Answering the second sentence of Paragraph 18, in which Plaintiff alleges, “As the then CDC director concluded: ‘We know of no other medication routinely used for a nonfatal condition that kills patients so frequently,’” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 18.

19. Denied.

20. Denied.

21. Noramco specifically denies that it has engaged in any misconduct. Except as thus stated, denied.

22. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 and can neither admit nor deny the same.

23. Noramco admits that the Plaintiff brings this action against the Defendants listed in the Complaint. Noramco specifically denies, however, that it is a proper defendant in this action. Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco also specifically denies that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action. Finally, Noramco specifically denies that Plaintiff is entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 23.

24. Paragraph 24 asserts legal conclusions regarding jurisdiction to which no response is required. To the extent a response is required, Noramco specifically denies that the Court has jurisdiction over any claims asserted against Noramco.

25. Paragraph 25 asserts a legal conclusion regarding jurisdiction to which no response is required. To the extent a response is required, Noramco specifically denies that the Court has jurisdiction over any claims asserted against Noramco.

26. Paragraph 26 asserts legal conclusions regarding jurisdiction to which no response is required. To the extent a response is required, Noramco denies that it committed any act or omission that would subject it to the jurisdiction of the Court, and therefore denies the allegations

in Paragraph 26. Noramco specifically denies that personal jurisdiction over it would be consistent with the due process requirements of the United States Constitution.

27. Paragraph 27 asserts legal conclusions regarding jurisdiction to which no response is required. To the extent a response is required, Noramco denies that it committed any act or omission that would subject it to the jurisdiction of the Court, and therefore denies the allegations in Paragraph 27. Noramco specifically denies that the “ends of justice” require service of or jurisdiction over Noramco.

28. Paragraph 28 asserts legal conclusions regarding venue to which no response is required. To the extent a response is required, Noramco denies that it committed any act or omission that would subject it to the venue of the Court, and therefore denies the allegations in Paragraph 28.

29. Noramco admits that Plaintiff brings this action to assert the claims in the Complaint and that Plaintiff purports that it “does not bring any product liability claims or causes of action and does not to seek compensatory damages for death, physical injury to person or emotional distress.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29 and can neither admit nor deny the same.

30. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph and can either admit nor deny the same.

31. Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations in Paragraph 31 and can neither admit nor deny the same.

32. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 and can neither admit nor deny the same.

33. Denied.

34. Denied.

35. Noramco admits only that Plaintiff purports to seek the relief alleged in the complaint. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 35.

36. The allegations in Paragraph 36 call for a legal conclusion to which no response is required.

37. Denied.

38. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 and can neither admit nor deny the same.

39. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 and can neither admit nor deny the same.

40. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 and can neither admit nor deny the same.

41. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 and can neither admit nor deny the same.

42. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 and can neither admit nor deny the same.

43. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 and can neither admit nor deny the same.

44. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 and can neither admit nor deny the same.

45. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45 and can neither admit nor deny the same.

46. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46 and can neither admit nor deny the same.

47. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47 and can neither admit nor deny the same.

48. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 and can neither admit nor deny the same.

49. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 and can neither admit nor deny the same.

50. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 50 and can neither admit nor deny the same.

51. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 51 and can neither admit nor deny the same.

52. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 52 and can neither admit nor deny the same.

53. Noramco admits only that its headquarters is located in Wilmington, Delaware, that it was a wholly-owned subsidiary of Johnson & Johnson until July 1, 2016, that it was acquired by SK Capital in July 2016, and that it only manufactures active pharmaceutical ingredients. Except as thus stated, Noramco denies the allegations in Paragraph 53.

54. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 54 and can neither admit nor deny the same.

55. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 55 and can neither admit nor deny the same.

56. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 56 and can neither admit nor deny the same.

57. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 57 and can neither admit nor deny the same.

58. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 58 and can neither admit nor deny the same.

59. Noramco admits only that Johnson & Johnson had a code of conduct during the time that Noramco was a wholly-owned subsidiary of Johnson & Johnson. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 59 and can neither admit nor deny the same.

60. Noramco admits only that Johnson & Johnson had a code of conduct during the time that Noramco was a wholly-owned subsidiary of Johnson & Johnson. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 60 and can neither admit nor deny the same.

61. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 61 and can neither admit nor deny the same.

62. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 62 and can neither admit nor deny the same.

63. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 63 and can neither admit nor deny the same.

64. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 64 and can neither admit nor deny the same.

65. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65 and can neither admit nor deny the same.

66. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 66 and can neither admit nor deny the same.

67. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and can neither admit nor deny the same.

68. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 68 and can neither admit nor deny the same.

69. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 69 and can neither admit nor deny the same.

70. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 70 and can neither admit nor deny the same.

71. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 71 and can neither admit nor deny the same.

72. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 72 and can neither admit nor deny the same.

73. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 73 and can neither admit nor deny the same.

74. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 74 and can neither admit nor deny the same.

75. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 75 and can neither admit nor deny the same.

76. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 76 and can neither admit nor deny the same.

77. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 77 and can neither admit nor deny the same.

78. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 78 and can neither admit nor deny the same.

79. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 79 and can neither admit nor deny the same.

80. Noramco admits only that Plaintiff refers to the entities listed in Paragraph 80 as “Marketing Defendants” and “RICO Marketing Defendants” as specified in that Paragraph. Noramco does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 80.

81. The allegations in Paragraph 81 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81 and can neither admit nor deny the same.

82. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 82 and can neither admit nor deny the same.

83. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 83 and can neither admit nor deny the same.

84. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 84 and can neither admit nor deny the same.

85. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 85 and can neither admit nor deny the same.

86. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 86 and can neither admit nor deny the same.

87. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 87 and can neither admit nor deny the same.

88. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 88 and can neither admit nor deny the same.

89. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 89 and can neither admit nor deny the same.

90. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 90 and can neither admit nor deny the same.

91. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 91 and can neither admit nor deny the same.

92. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 92 and can neither admit nor deny the same.

93. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 93 and can neither admit nor deny the same.

94. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 94 and can neither admit nor deny the same.

95. The allegations in Paragraph 95 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco admits only that Plaintiff refers to the entities listed in Paragraph 95 as “National Retail Pharmacies” as specified in that Paragraph. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 95.

96. The allegations in Paragraph 96 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco admits only that Plaintiff refers to the entities listed in Paragraph 96 as “Distributor Defendants” and “RICO Supply Chain Defendants” as specified in that Paragraph. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 96.

97. Noramco admits only that Plaintiff refers to the entities listed in the Complaint in accordance with the various collective names identified in the Complaint. Noramco specifically denies that Plaintiff is entitled to relief from Noramco. Except as thus stated, Noramco denies the allegations in Paragraph 97.

98. Denied

99. Noramco admits only that opioids, when FDA approved, are used to treat pain and that opioids are derived from the poppy. Except as thus stated, Noramco denies the allegations in Paragraph 99.

100. Noramco admits only the allegations in the second sentence of Paragraph 100, in which Plaintiff alleges: “The opium poppy contains various opium alkaloids, three of which are used in the pharmaceutical industry today: morphine, codeine, and thebaine.” Noramco denies the allegations in first sentence of Paragraph 100. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 100 and can neither admit nor deny the same.

101. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 101 and can neither admit nor deny the same.

102. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 102 and can neither admit nor deny the same.

103. Denied.

104. Noramco admits only that opioids are regulated as Schedule II controlled substances. Except as thus stated, Noramco denies the allegations in Paragraph 104.

105. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 105 and can neither admit nor deny the same.

106. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 106 and can neither admit nor deny the same.

107. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 107 and can neither admit nor deny the same.

108. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 108 and can neither admit nor deny the same.

109. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 109 and can neither admit nor deny the same.

110. Noramco admits only that fentanyl is a synthetic opioid. Except as thus stated, Noramco denies the allegations in Paragraph 110.

111. Noramco admits only that different types of opioids act differently depending on their specific properties and presentations as short-acting or long-acting formulations. Except as thus stated, Noramco denies the allegations in Paragraph 111.

112. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 112 and can neither admit nor deny the same.

113. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 113 and can neither admit nor deny the same.

114. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 114 and can neither admit nor deny the same.

115. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115 and can neither admit nor deny the same.

116. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 116 and can neither admit nor deny the same.

117. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 117 and can neither admit nor deny the same.

118. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 118 and can neither admit nor deny the same.

119. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119 and can neither admit nor deny the same.

120. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 120 and can neither admit nor deny the same.

121. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 121 and can neither admit nor deny the same.

122. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 122 and can neither admit nor deny the same.

123. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 123 and can neither admit nor deny the same.

124. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 124 and can neither admit nor deny the same.

125. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 125 and can neither admit nor deny the same.

126. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 126 and can neither admit nor deny the same.

127. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 127 and can neither admit nor deny the same.

128. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 128 and can neither admit nor deny the same.

129. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 129 and can neither admit nor deny the same.

130. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 130 and can neither admit nor deny the same.

131. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 131 and can neither admit nor deny the same.

132. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 132 and can neither admit nor deny the same.

133. Denied.

134. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 134 and can neither admit nor deny the same.

135. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 135 and can neither admit nor deny the same.

136. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 136 and can neither admit nor deny the same.

137. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 137 and can neither admit nor deny the same.

138. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 138 and can neither admit nor deny the same.

139. Noramco admits only that the drug marketed as Nucynta was made of an opioid-like synthetic active ingredient called Tapentadol HCl. Except as thus stated, denied.

140. Noramco denies the allegations in the first sentence of Paragraph 140, in which Plaintiff alleges: “By adding additional opioids or expanding the use of their existing opioid products, the other Marketing Defendants took advantage of the market created by Purdue’s aggressive promotion of OxyContin and reaped enormous profits.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 140 and can neither admit nor deny the same.

141. Denied.

142. Denied.

143. The allegations in Paragraph 143 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in Paragraph 143.

144. Denied.

145. Denied.

146. Denied.

147. Denied, including all subparagraphs.

148. Denied.

149. Denied. In further response to Paragraph 149, Noramco states that it does not (and did not at all material times relevant hereto) manufacture, package, brand, market, distribute, or sell the finished drug products at issue in this litigation.

150. Denied.

151. Denied.

152. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 152 and can neither admit nor deny the same.

153. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 153 and can neither admit nor deny the same.

154. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 154 and can neither admit nor deny the same.

155. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155 and can neither admit nor deny the same.

156. Noramco denies that it ever referenced the Porter & Jick letter. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 156 and can neither admit nor deny the same.

157. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 157 and can neither admit nor deny the same.

158. Denied.

159. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 159 and can neither admit nor deny the same.

160. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 160 and can neither admit nor deny the same.

161. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 161 and can neither admit nor deny the same.

162. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 162 and can neither admit nor deny the same.

163. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 163 and can neither admit nor deny the same.

164. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 164 and can neither admit nor deny the same.

165. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 165 and can neither admit nor deny the same.

166. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 166 and can neither admit nor deny the same.

167. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 167 and can neither admit nor deny the same.

168. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 168 and can neither admit nor deny the same.

169. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 169 and can neither admit nor deny the same.

170. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 170 and can neither admit nor deny the same.

171. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 171 and can neither admit nor deny the same.

172. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 172 and can neither admit nor deny the same.

173. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 173 and can neither admit nor deny the same.

174. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 174 and can neither admit nor deny the same.

175. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 175 and can neither admit nor deny the same.

176. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 176 and can neither admit nor deny the same.

177. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177 and can neither admit nor deny the same.

178. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 178 and can neither admit nor deny the same.

179. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 179 and can neither admit nor deny the same.

180. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 180 and can neither admit nor deny the same.

181. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 181 and can neither admit nor deny the same.

182. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 182 and can neither admit nor deny the same.

183. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 183 and can neither admit nor deny the same.

184. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 184 and can neither admit nor deny the same.

185. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 185 and can neither admit nor deny the same.

186. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 186 and can neither admit nor deny the same.

187. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 187 and can neither admit nor deny the same.

188. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 188 and can neither admit nor deny the same.

189. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 189 and can neither admit nor deny the same.

190. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and can neither admit nor deny the same.

191. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 191 and can neither admit nor deny the same.

192. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 192 and can neither admit nor deny the same.

193. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 193 and can neither admit nor deny the same.

194. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 194 and can neither admit nor deny the same.

195. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 195 and can neither admit nor deny the same.

196. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 196 and can neither admit nor deny the same.

197. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 197 and can neither admit nor deny the same.

198. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 198 and can neither admit nor deny the same.

199. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 199 and can neither admit nor deny the same.

200. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 200 and can neither admit nor deny the same.

201. Denied.

202. Denied.

203. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 and can neither admit nor deny the same.

204. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 204 and can neither admit nor deny the same.

205. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 205 and can neither admit nor deny the same.

206. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 206 and can neither admit nor deny the same.

207. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 207 and can neither admit nor deny the same.

208. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 208 and can neither admit nor deny the same.

209. Denied.

210. Noramco denies the allegations in the first sentence of Paragraph 210. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 210 and can neither admit nor deny the same.

211. Denied.

212. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 212 and can neither admit nor deny the same.

213. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 213 and can neither admit nor deny the same.

214. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 214 and can neither admit nor deny the same.

215. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 215 and can neither admit nor deny the same.

216. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 and can neither admit nor deny the same.

217. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 217 and can neither admit nor deny the same.

218. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 218 and can neither admit nor deny the same.

219. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 219 and can neither admit nor deny the same.

220. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 220 and can neither admit nor deny the same.

221. Denied.

222. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 222 and can neither admit nor deny the same.

223. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 223 and can neither admit nor deny the same.

224. Denied.

225. Denied.

226. Noramco denies the allegations in the first sentence of Paragraph 226. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 226 and can neither admit nor deny the same.

227. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 227 and can neither admit nor deny the same.

228. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 228 and can neither admit nor deny the same.

229. Noramco denies the allegations in the first sentence of Paragraph 229. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 229 and can neither admit nor deny the same.

230. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 230 and can neither admit nor deny the same.

231. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 231 and can neither admit nor deny the same.

232. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 232 and can neither admit nor deny the same.

233. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 233 and can neither admit nor deny the same.

234. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 234 and can neither admit nor deny the same.

235. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 235 and can neither admit nor deny the same.

236. Noramco denies the allegations in the first sentence of Paragraph 236. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 236 and can neither admit nor deny the same.

237. Denied.

238. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 238 and can neither admit nor deny the same.

239. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 239 and can neither admit nor deny the same.

240. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 240 and can neither admit nor deny the same.

241. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 241 and can neither admit nor deny the same.

242. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 242 and can neither admit nor deny the same.

243. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 243 and can neither admit nor deny the same.

244. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 244 and can neither admit nor deny the same.

245. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 245 and can neither admit nor deny the same.

246. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 246 and can neither admit nor deny the same.

247. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 247 and can neither admit nor deny the same.

248. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 248 and can neither admit nor deny the same.

249. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 249 and can neither admit nor deny the same.

250. Noramco denies the allegations in the first and third sentences of Paragraph 250. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 250 and can neither admit nor deny the same.

251. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 251 and can neither admit nor deny the same.

252. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 252 and can neither admit nor deny the same.

253. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 253 and can neither admit nor deny the same.

254. Denied.

255. Denied.

256. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 256 and can neither admit nor deny the same.

257. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 257 and can neither admit nor deny the same.

258. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 258 and can neither admit nor deny the same.

259. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 259 and can neither admit nor deny the same.

260. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 260 and can neither admit nor deny the same.

261. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 261 and can neither admit nor deny the same.

262. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 262 and can neither admit nor deny the same.

263. Noramco denies the allegations in the first sentence of Paragraph 263. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 263 and can neither admit nor deny the same.

264. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 264 and can neither admit nor deny the same.

265. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 265 and can neither admit nor deny the same.

266. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 266 and can neither admit nor deny the same.

267. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267 and can neither admit nor deny the same.

268. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 268 and can neither admit nor deny the same.

269. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 269 and can neither admit nor deny the same.

270. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 270 and can neither admit nor deny the same.

271. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 271 and can neither admit nor deny the same.

272. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 272 and can neither admit nor deny the same.

273. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 273 and can neither admit nor deny the same.

274. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 274 and can neither admit nor deny the same.

275. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 275 and can neither admit nor deny the same.

276. Noramco denies the allegations in the final sentence of Paragraph 276. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 276 and can neither admit nor deny the same.

277. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 277 and can neither admit nor deny the same.

278. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 278 and can neither admit nor deny the same.

279. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 279 and can neither admit nor deny the same.

280. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 280, including all subparagraphs, and can neither admit nor deny the same.

281. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 281 and can neither admit nor deny the same.

282. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 282 and can neither admit nor deny the same.

283. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 283 and can neither admit nor deny the same.

284. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 284 and can neither admit nor deny the same.

285. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 285 and can neither admit nor deny the same.

286. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 286 and can neither admit nor deny the same.

287. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 287 and can neither admit nor deny the same.

288. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 288 and can neither admit nor deny the same.

289. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 289 and can neither admit nor deny the same.

290. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 290 and can neither admit nor deny the same.

291. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 291 and can neither admit nor deny the same.

292. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 292 and can neither admit nor deny the same.

293. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 293 and can neither admit nor deny the same.

294. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 294 and can neither admit nor deny the same.

295. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 295 and can neither admit nor deny the same.

296. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 296 and can neither admit nor deny the same.

297. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 297 and can neither admit nor deny the same.

298. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 298 and can neither admit nor deny the same.

299. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 299 and can neither admit nor deny the same.

300. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 300 and can neither admit nor deny the same.

301. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 301 and can neither admit nor deny the same.

302. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 302 and can neither admit nor deny the same.

303. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 303 and can neither admit nor deny the same.

304. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 304 and can neither admit nor deny the same.

305. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 305 and can neither admit nor deny the same.

306. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 306 and can neither admit nor deny the same.

307. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 307 and can neither admit nor deny the same.

308. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 308 and can neither admit nor deny the same.

309. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 309 and can neither admit nor deny the same.

310. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 310 and can neither admit nor deny the same.

311. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 311 and can neither admit nor deny the same.

312. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 312 and can neither admit nor deny the same.

313. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 313 and can neither admit nor deny the same.

314. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 314 and can neither admit nor deny the same.

315. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 315 and can neither admit nor deny the same.

316. Denied.

317. Denied.

318. Denied.

319. Denied.

320. Noramco denies the allegations in the second sentence of Paragraph 352, in which Plaintiff alleges: “Marketing Defendants exerted influence and effective control over the messaging by these groups by providing major funding directly to them, as well as through KOLs who served on their boards.” Noramco further denies the allegations in the fourth sentence of Paragraph 352, in which Plaintiff alleges: “Defendants funded these Front Groups in order to ensure supportive messages from these seemingly neutral and credible third parties, and their funding did, in fact, ensure such supportive messages—often at the expense of their own constituencies.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352 and can neither admit nor deny the same.

321. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 321 and can neither admit nor deny the same.

322. Denied.

323. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 323 and can neither admit nor deny the same.

324. Denied.

325. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 325 and can neither admit nor deny the same.

326. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 326 and can neither admit nor deny the same.

327. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 327 and can neither admit nor deny the same.

328. Noramco denies the allegations in the first two sentences of Paragraph 328, in which Plaintiff alleges: “APF was often called upon to provide ‘patient representatives’ for the Marketing Defendants’ promotional activities, including for Purdue’s ‘Partners Against Pain’ and Janssen’s ‘Let’s Talk Pain.’ Although APF presented itself as a patient advocacy organization, it functioned largely as an advocate for the interests of the Marketing Defendants, not patients.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 328 and can neither admit nor deny the same.

329. Denied.

330. Noramco denies the allegations in the first sentence of Paragraph 330, in which Plaintiff alleges: “This alignment of interests was expressed most forcefully in the fact that Purdue hired APF to provide consulting services on its marketing initiatives. Purdue and APF entered into a ‘Master Consulting Services’ Agreement on September 14, 2011.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 330 and can neither admit nor deny the same.

331. Noramco denies the allegations in the first and second sentences of Paragraph 331, in which Plaintiff alleges: “APF’s Board of Directors was largely comprised of doctors who were on the Marketing Defendants’ payrolls, either as consultants or speakers at medical events. The close relationship between APF and the Marketing Defendants demonstrates APF’s clear lack of

independence, in its finances, management, and mission, and its willingness to allow Marketing Defendants to control its activities and messages supports an inference that each Defendant that worked with it was able to exercise editorial control over its publications—even when Defendants’ messages contradicted APF’s internal conclusions.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 331 and can neither admit nor deny the same.

332. Noramco denies the allegations in the final sentence of Paragraph 332, in which Plaintiff alleges: “Without support from Marketing Defendants, to whom APF could no longer be helpful, APF was no longer financially viable.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 364 and can neither admit nor deny the same.

333. Noramco denies the allegations in the first sentence of Paragraph 333, in which Plaintiff alleges: “The American Academy of Pain Medicine (‘AAPM’) and the American Pain Society (‘APS’) are professional medical societies, each of which received substantial funding from Defendants from 2009 to 2013.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 333 and can neither admit nor deny the same.

334. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 334 and can neither admit nor deny the same.

335. Noramco specifically denies that Dr. Scott Fishman served as a key opinion leader, or “KOL,” for Noramco. Except as thus stated, Noramco is without knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 335 and can neither admit nor deny the same.

336. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 336 and can neither admit nor deny the same.

337. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 337 and can neither admit nor deny the same.

338. Denied.

339. Noramco denies the second sentence of Paragraph 339, in which Plaintiff alleges: “AAPM, with the assistance, prompting, involvement, and funding of Defendants, issued the treatment guidelines discussed herein, and continued to recommend the use of opioids to treat chronic pain.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 339 and can neither admit nor deny the same.

340. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 340 and can neither admit nor deny the same.

341. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 341 and can neither admit nor deny the same.

342. Answering the allegations in the final sentence of Paragraph 342, in which Plaintiff alleges, “For that reason, the CDC has recognized that treatment guidelines can ‘change prescribing practices,’” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 342.

343. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 343 and can neither admit nor deny the same.

344. Noramco denies the allegations in the first sentence of Paragraph 344, in which Plaintiff alleges: “The Marketing Defendants widely cited and promoted the 2009 Guidelines without disclosing the lack of evidence to support their conclusions, their involvement in the development of the Guidelines or their financial backing of the authors of these Guidelines.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 344 and can neither admit nor deny the same.

345. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 345 and can neither admit nor deny the same.

346. Denied.

347. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 347 and can neither admit nor deny the same.

348. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 348 and can neither admit nor deny the same.

349. Noramco denies the allegations in the first sentence of Paragraph 349, in which Plaintiff alleges: “FSMB’s 2007 publication Responsible Opioid Prescribing was backed largely by drug manufacturers, including Purdue, Endo and Cephalon.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 349 and can neither admit nor deny the same.

350. Noramco denies the allegations in the first sentence of Paragraph 350, in which Plaintiff alleges: “The Marketing Defendants relied on the 1998 Guidelines to convey the alarming

message that ‘under-treatment of pain’ would result in official discipline, but no discipline would result if opioids were prescribed as part of an ongoing patient relationship and prescription decisions were documented.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 350 and can neither admit nor deny the same.

351. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 351 and can neither admit nor deny the same.

352. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 352 and can neither admit nor deny the same.

353. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 353 and can neither admit nor deny the same.

354. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 354 and can neither admit nor deny the same.

355. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 355 and can neither admit nor deny the same.

356. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 356 and can neither admit nor deny the same.

357. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 357 and can neither admit nor deny the same.

358. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 358 and can neither admit nor deny the same.

359. Answering the allegations in the final sentence of Paragraph 359, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegation and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 359.

360. Answering the third and fourth sentences of Paragraph 360, in which Plaintiff alleges, “AGS contracted with Purdue, Endo and Janssen to disseminate guidelines regarding the use of opioids for chronic pain in 2002 (The Management of Persistent Pain in Older Persons, hereinafter ‘2002 AGS Guidelines’) and 2009 (Pharmacological Management of Persistent Pain in Older Persons, hereinafter ‘2009 AGS Guidelines’). According to news reports, AGS has received at least \$344,000 in funding from opioid manufacturers since 2009,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 360.

361. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 361 and can neither admit nor deny the same.

362. Noramco denies the allegations in the first sentence of Paragraph 362. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 362 and can neither admit nor deny the same.

363. Noramco denies the allegations in the first sentence of Paragraph 363. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 363 and can neither admit nor deny the same.

364. Denied.

365. Denied.

366. Denied.

367. Denied.

368. Noramco denies the allegations in the first sentence of Paragraph 368, in which Plaintiff alleges: “In return for their pro-opioid advocacy, the Marketing Defendants’ KOLs received money, prestige, recognition, research funding, and avenues to publish.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 368 and can neither admit nor deny the same.

369. Denied.

370. Denied.

371. Denied.

372. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 372 and can neither admit nor deny the same.

373. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 373 and can neither admit nor deny the same.

374. Noramco denies the allegations in the first sentence of Paragraph 374. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 374 and can neither admit nor deny the same.

375. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 375 and can neither admit nor deny the same.

376. Noramco denies the allegations in the first sentence of Paragraph 376. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 376 and can neither admit nor deny the same.

377. Noramco denies the allegations in the first sentence of Paragraph 377. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 377 and can neither admit nor deny the same.

378. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 378 and can neither admit nor deny the same.

379. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 379 and can neither admit nor deny the same.

380. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 380 and can neither admit nor deny the same.

381. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 381 and can neither admit nor deny the same.

382. Noramco denies the allegations in the final sentence of Paragraph 382, in which Plaintiff alleges: “In keeping with the Marketing Defendants’ promotional messages, Dr. Webster apparently believed the solution to patients’ tolerance or addictive behaviors was more opioids: he prescribed staggering quantities of pills.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 382 and can neither admit nor deny the same.

383. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 383 and can neither admit nor deny the same.

384. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 384 and can neither admit nor deny the same.

385. Noramco denies the allegations in the first sentence of Paragraph 385, in which Plaintiff alleges: “Dr. Perry Fine’s ties to the Marketing Defendants have been well documented.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 385 and can neither admit nor deny the same.

386. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 386 and can neither admit nor deny the same.

387. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 387 and can neither admit nor deny the same.

388. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 388 and can neither admit nor deny the same.

389. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 389 and can neither admit nor deny the same.

390. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 390 and can neither admit nor deny the same.

391. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 391 and can neither admit nor deny the same.

392. Noramco denies the allegations in the third sentence of Paragraph 392, in which Plaintiff alleges: “As discussed below, he has authored publications, including the seminal guides on opioid prescribing, which were funded by the Marketing Defendants.” Except as thus stated,

Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 392 and can neither admit nor deny the same.

393. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 393 and can neither admit nor deny the same.

394. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 394 and can neither admit nor deny the same.

395. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 395 and can neither admit nor deny the same.

396. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 396 and can neither admit nor deny the same.

397. Denied.

398. Denied.

399. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 399 and can neither admit nor deny the same.

400. Noramco denies the allegations in the final sentence of Paragraph 400, in which Plaintiff alleges: “As one target, Defendants aimed to reach general practitioners, whose broad area of practice and lack of expertise and specialized training in pain management made them particularly dependent upon CMEs and, as a result, especially susceptible to the Marketing Defendants’ deceptions.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 400 and can neither admit nor deny the same.

401. Denied.

402. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 402 and can neither admit nor deny the same.

403. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 403 and can neither admit nor deny the same.

404. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 404 and can neither admit nor deny the same.

405. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 405 and can neither admit nor deny the same.

406. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 406 and can neither admit nor deny the same.

407. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 407 and can neither admit nor deny the same.

408. Denied.

409. Denied.

410. Answering the allegations in the final sentence of Paragraph 410, in which Plaintiff alleges, “The 2011 total includes \$8.3 million by Purdue, \$4.9 million by Janssen, and \$1.1 million by Endo,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 410.

411. Answering the allegations in the fourth sentence of Paragraph 411, in which Plaintiff alleges, “Endo’s research, for example, also found that such communications resulted in greater patient ‘brand loyalty,’ with longer durations of Opana ER therapy and fewer

discontinuations,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 411.

412. Noramco denies the allegations in the first sentence of Paragraph 412, in which Plaintiff alleges: “The Marketing Defendants also aggressively promoted opioids through ‘unbranded advertising’ to generally tout the benefits of opioids without specifically naming a particular brand-name opioid drug.” Noramco further denies the allegations in the final sentence of Paragraph 444, in which Plaintiff alleges: “Through unbranded materials, the Marketing Defendants expanded the overall acceptance of and demand for chronic opioid therapy without the restrictions imposed by regulations on branded advertising.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 412 and can neither admit nor deny the same.

413. Noramco denies the allegations in the first sentence of Paragraph 413. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 413 and can neither admit nor deny the same.

414. Denied.

415. Denied.

416. Denied.

417. Denied.

418. Denied.

419. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 419 and can neither admit nor deny the same.

420. Denied.

421. Denied.

422. Denied.

423. Answering the allegations in the final sentence of Paragraph 423, in which Plaintiff alleges, “The amount includes \$108 million spent by Purdue, \$34 million by Janssen, \$13 million by Teva, and \$10 million by Endo,” Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 423.

424. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 424 and can neither admit nor deny the same.

425. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 425 and can neither admit nor deny the same.

426. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 426 and can neither admit nor deny the same.

427. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 427 and can neither admit nor deny the same.

428. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 428 and can neither admit nor deny the same.

429. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 429 and can neither admit nor deny the same.

430. Answering the allegations in the final sentence of Paragraph 430, in which Plaintiff alleges, “Purdue, Janssen, Endo, Cephalon, and Mallinckrodt each made thousands of payments

to physicians nationwide, for activities including participating on speakers' bureaus, providing consulting services, and other services," Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 430.

431. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 431 and can neither admit nor deny the same.

432. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 432 and can neither admit nor deny the same.

433. The allegations in Paragraph 433 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco admits only that it does not sell its active pharmaceutical ingredients to consumers and those active pharmaceutical ingredients are not prescribed by physicians or the healthcare community. Except as thus stated, denied.

434. The allegations in Paragraph 434 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco admits only that it does not sell its active pharmaceutical ingredients to consumers and those active pharmaceutical ingredients are not prescribed by physicians or the healthcare community. Except as thus stated, denied.

435. Denied.

436. The allegations in Paragraph 436 are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent a response is required, Noramco admits only that it does not sell its active pharmaceutical ingredients to consumers and those active pharmaceutical ingredients are not prescribed by physicians or the healthcare community. Except as thus stated, denied.

437. Denied.

438. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 438 and can neither admit nor deny the same.

439. Noramco denies the allegations in the first sentence of Paragraph 439. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 439 and can neither admit nor deny the same.

440. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 440 and can neither admit nor deny the same.

441. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 441 and can neither admit nor deny the same.

442. Noramco denies the allegations in the first sentence of Paragraph 442. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 442 and can neither admit nor deny the same.

443. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443 and can neither admit nor deny the same.

444. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444 and can neither admit nor deny the same.

445. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 445 and can neither admit nor deny the same.

446. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 446 and can neither admit nor deny the same.

447. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 447 and can neither admit nor deny the same.

448. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 448 and can neither admit nor deny the same.

449. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 449 and can neither admit nor deny the same.

450. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 450 and can neither admit nor deny the same.

451. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 451 and can neither admit nor deny the same.

452. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 452 and can neither admit nor deny the same.

453. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 453 and can neither admit nor deny the same.

454. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 454 and can neither admit nor deny the same.

455. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 455 and can neither admit nor deny the same.

456. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456 and can neither admit nor deny the same.

457. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457 and can neither admit nor deny the same.

458. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 458 and can neither admit nor deny the same.

459. Denied.

460. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 460 and can neither admit nor deny the same.

461. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 461 and can neither admit nor deny the same.

462. Denied.

463. Noramco denies the allegations in the first sentence of Paragraph 463. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 463 and can neither admit nor deny the same.

464. Noramco denies the allegations in the first sentence of Paragraph 464, in which Plaintiff alleges: “Marketing Defendants spent millions of dollars to market their drugs to prescribers and patients and meticulously tracked their return on that investment.” Noramco further denies the allegations in the final sentence of Paragraph 464, in which Plaintiff alleges: “These results are directly due to the Marketing Defendants’ fraudulent marketing campaign focused on several misrepresentations.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 464 and can neither admit nor deny the same.

465. Denied.

466. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 466 and can neither admit nor deny the same.

467. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 467 and can neither admit nor deny the same.

468. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 468 and can neither admit nor deny the same.

469. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco specifically denies that it promoted any finished drug product, including prescription opioids. Except as thus stated, denied.

470. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

471. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

472. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

473. Denied.

474. Denied.

475. Answering the second sentence of Paragraph 475, in which Plaintiff alleges, “Distributor Defendants worked together in an illicit enterprise, engage in conduct that was not only illegal, but in certain respects anti-competitive, with the common purpose and achievement

of vastly increasing their respective profits and revenues by exponentially expanding a market that the law intended to restrict,” Noramco responds that the allegations in this sentence are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations; to the extent the allegations in this sentence are addressed to Noramco, Noramco denies the allegations in this sentence. Except as thus stated, as to the remaining allegations in Paragraph 475, Noramco denies these allegations. Noramco specifically denies that it engaged in any wrongful conduct.

476. Noramco denies the first sentence of Paragraph 476, in which Plaintiff alleges: “For over a decade, as the Marketing Defendants increased the demand for opioids, all the Defendants aggressively sought to bolster their revenue, increase profit, and grow their share of the prescription painkiller market by unlawfully and surreptitiously increasing the volume of opioids they sold.” Except as thus stated, as to the remaining allegations in Paragraph 476, those allegations call for a legal conclusion to which no response is required.

477. The allegations in Paragraph 477 call for a legal conclusion to which no response is required.

478. Noramco denies the allegations in the first, second, and third sentences of Paragraph 478, in which Plaintiff alleges: “Marketing Defendants’ scheme was resoundingly successful. Chronic opioid therapy—the prescribing of opioids long-term to treat chronic pain—has become a commonplace, and often first-line, treatment. Marketing Defendants’ deceptive marketing caused prescribing not only of their opioids, but of opioids as a class, to skyrocket.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as

to the truth of the allegations in improperly numbered Paragraph 478 and can neither admit nor deny the same.

479. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 479 and can neither admit nor deny the same.

480. The allegations in Paragraph 480 call for a legal conclusion to which no response is required.

481. Answering the first sentence in Paragraph 481, the allegations in that sentence call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 481.

482. The allegations in Paragraph 482 call for a legal conclusion to which no response is required.

483. Noramco denies the final sentence of Paragraph 483. Except as thus stated, the allegations in Paragraph 483 call for a legal conclusion to which no response is required.

484. The allegations in Paragraph 484 call for a legal conclusion to which no response is required.

485. Answering the allegations in first sentence of Paragraph 485, Noramco responds that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Answering the second sentence of Paragraph 485, Noramco admits the allegations in that sentence only. Answering the third, fourth, and fifth sentences of Paragraph 485, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Answering the sixth sentence of Paragraph 485, Noramco states that the allegations in that sentence

call for a legal conclusion to which no response is required. Noramco denies the allegations in the seventh and eighth sentences of Paragraph 485.

486. The allegations in Paragraph 486 call for a legal conclusion to which no response is required.

487. Noramco admits only the allegations in the first sentence of Paragraph 487, in which Plaintiff alleges: “Central to the closed-system created by the CSA was the directive that the DEA determine quotas of each basic class of Schedule I and II controlled substances each year.” Except as thus stated, as to the remaining allegations in Paragraph 487, including all subparagraphs, Noramco is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same.

488. The allegations in Paragraph 488 call for a legal conclusion to which no response is required.

489. The allegations in Paragraph 489 call for a legal conclusion to which no response is required.

490. Answering the allegations in the final sentence in Paragraph 490, in which Plaintiff alleges, “For this reason, identification of suspicious orders serves also to identify excessive volume of the controlled substance being shipped to a particular region,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, the remaining allegations in Paragraph 490 call for a legal conclusion to which no response is required.

491. The allegations in Paragraph 491 call for a legal conclusion to which no response is required.

492. The allegations in Paragraph 492 call for a legal conclusion to which no response is required.

493. The allegations in Paragraph 493 call for a legal conclusion to which no response is required.

494. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 494 and can neither admit nor deny the same.

495. Denied.

496. The allegations in Paragraph 496 call for a legal conclusion to which no response is required.

497. Denied.

498. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 498 and can neither admit nor deny the same.

499. Denied.

500. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 500 and can neither admit nor deny the same.

501. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 501 and can neither admit nor deny the same.

502. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 502 and can neither admit nor deny the same.

503. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 503 and can neither admit nor deny the same.

504. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 504 and can neither admit nor deny the same.

505. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 505 and can neither admit nor deny the same.

506. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 506 and can neither admit nor deny the same.

507. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 507 and can neither admit nor deny the same.

508. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 508 and can neither admit nor deny the same.

509. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 509 and can neither admit nor deny the same.

510. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 510 and can neither admit nor deny the same.

511. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 511.

512. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 512.

513. Denied.

514. Noramco denies the allegations in the first and second sentences of Paragraph 514, in which Plaintiff alleges: “Wholesale distributors such as the Distributor Defendants had close financial relationships with both Marketing Defendants and customers, for whom they provide a

broad range of value added services that render them uniquely positioned to obtain information and control against diversion. These services often otherwise would not be provided by manufacturers to their dispensing customers and would be difficult and costly for the dispenser to reproduce.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 514 and can neither admit nor deny the same.

515. Denied.

516. Answering the second sentence of Paragraph 516, in which Plaintiff alleges, “Defendants are required to maintain certain security protocols and storage facilities for the manufacture and distribution of their opiates,” Noramco states that these allegations call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 516.

517. Denied.

518. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 518 and can neither admit nor deny the same.

519. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 519 and can neither admit nor deny the same.

520. Noramco denies the allegations in the third and fourth sentences of Paragraph 520, in which Plaintiff alleges: “Each of the Marketing Defendants worked together through the PCF. But, the Marketing Defendants were not alone.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 520 and can neither admit nor deny the same.

521. Answering the allegations in the second sentence of Paragraph 521, in which Plaintiff alleges, “Although the entire HDA membership directory is private, the HDA website confirms that each of the Distributor Defendants and several of the Marketing Defendants, including Actavis, Endo, Purdue, Mallinckrodt, and Cephalon, were members of the HDA,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, denied.

522. Denied.

523. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 523 and can neither admit nor deny the same.

524. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 524 and can neither admit nor deny the same.

525. Denied.

526. Answering the first sentence of Paragraph 526, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 526.

527. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 527, including all subparagraphs, and can neither admit nor deny the same.

528. Answering the allegations in the second sentence of Paragraph 528, in which Plaintiff alleges, “For example, on April 27, 2011, the HDA offered a Webinar to ‘accurately and effectively exchange business transactions between distributors and manufacturers,’” Noramco

states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 528.

529. Denied.

530. Denied.

531. Noramco denies the allegations in the first sentence of Paragraph 531. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 531 and can neither admit nor deny the same.

532. Answering the allegations in the second sentence of Paragraph 532, in which Plaintiff alleges, “As John M. Gray, President/CEO of the HDA stated to the Energy and Commerce Subcommittee on Health in April 2014, is ‘difficult to find the right balance between proactive anti-diversion efforts while not inadvertently limiting access to appropriately prescribed and dispensed medications,’” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 532.

533. Denied.

534. Denied.

535. Denied

536. The allegations in the first sentence of Paragraph 536 call for a legal conclusion to which no response is required. Except as thus stated, denied.

537. Denied.

538. Denied.

539. Denied.

540. Denied.

541. Denied, including all subparagraphs.

542. Denied.

543. Denied.

544. Answering the allegations in the first and second sentences of Paragraph 544, Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 544.

545. Denied.

546. Denied.

547. Denied.

548. Noramco denies the allegations in the first sentence of Paragraph 548. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 548 and can neither admit nor deny the same.

549. Denied.

550. Answering the allegations in the final sentence of Paragraph 550, in which Plaintiff alleges, “These numbers include seventy-six (76) actions involving orders to show cause and forty-one (41) actions involving immediate suspension orders, all for failure to report suspicious orders,” Noramco states that it is without knowledge or information sufficient to form a belief as to the truth of such allegations and can neither admit nor deny the same. Except as thus stated, Noramco denies the allegations in Paragraph 550.

551. Noramco denies the allegations in the first sentence of Paragraph 551. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 551 and can neither admit nor deny the same.

552. Noramco denies the allegations in the first sentence of Paragraph 552. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 552 and can neither admit nor deny the same.

553. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 553 and can neither admit nor deny the same.

554. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 554 and can neither admit nor deny the same.

555. Denied.

556. Denied.

557. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 557 and can neither admit nor deny the same.

558. Noramco denies the allegations in the first sentence of Paragraph 558. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 558 and can neither admit nor deny the same.

559. Denied.

560. Noramco denies the allegations in the first sentence of Paragraph 560. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 560 and can neither admit nor deny the same.

561. Noramco denies the allegations in the first sentence of Paragraph 561. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 561 and can neither admit nor deny the same.

562. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 562 and can neither admit nor deny the same.

563. Denied.

564. Denied.

565. Denied.

566. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 566 and can neither admit nor deny the same.

567. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 567 and can neither admit nor deny the same.

568. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 568 and can neither admit nor deny the same.

569. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 569 and can neither admit nor deny the same.

570. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 570, including all subparagraphs, and can neither admit nor deny the same.

571. Noramco denies the allegations in the fourth sentence of Paragraph 571, in which Plaintiff alleges: “These quantities alone are sufficient to show that the Defendants failed to control the supply chain or to report and take steps to halt suspicious orders.” Except as thus stated,

Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 571 and can neither admit nor deny the same.

572. Denied.

573. Denied.

574. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 574 and can neither admit nor deny the same.

575. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 575 and can neither admit nor deny the same.

576. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 576 and can neither admit nor deny the same.

577. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 577 and can neither admit nor deny the same.

578. Denied, including all subparagraphs.

579. Denied.

580. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 580 and can neither admit nor deny the same.

581. Noramco denies the allegations in the first sentence of Paragraph 581. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 581 and can neither admit nor deny the same.

582. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 582 and can neither admit nor deny the same.

583. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 583 and can neither admit nor deny the same.

584. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 584 and can neither admit nor deny the same.

585. Denied.

586. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 586 and can neither admit nor deny the same.

587. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 587 and can neither admit nor deny the same.

588. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 588 and can neither admit nor deny the same.

589. Noramco denies the allegations in the fourth sentence of Paragraph 589, in which Plaintiff alleges: “On information and belief, the National Retail Pharmacies also provided Defendants with data regarding, inter alia, individual doctors in exchange for rebates or other forms of consideration.” Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 589 and can neither admit nor deny the same.

590. The allegations in Paragraph 590 call for a legal conclusion to which no response is required.

591. The allegations in Paragraph 591 call for a legal conclusion to which no response is required.

592. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 592 and can neither admit nor deny the same.

593. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 593 and can neither admit nor deny the same.

594. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 594 and can neither admit nor deny the same.

595. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 595 and can neither admit nor deny the same.

596. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 596 and can neither admit nor deny the same.

597. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 597 and can neither admit nor deny the same.

598. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 598 and can neither admit nor deny the same.

599. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 599 and can neither admit nor deny the same.

600. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 600 and can neither admit nor deny the same.

601. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 601 and can neither admit nor deny the same.

602. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 602 and can neither admit nor deny the same.

603. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 603 and can neither admit nor deny the same.

604. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 604 and can neither admit nor deny the same.

605. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 605 and can neither admit nor deny the same.

606. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 606 and can neither admit nor deny the same.

607. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 607 and can neither admit nor deny the same.

608. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 608 and can neither admit nor deny the same.

609. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 609 and can neither admit nor deny the same.

610. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 610 and can neither admit nor deny the same.

611. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 611 and can neither admit nor deny the same.

612. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 612 and can neither admit nor deny the same.

613. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 613 and can neither admit nor deny the same.

614. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 614 and can neither admit nor deny the same.

615. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 615 and can neither admit nor deny the same.

616. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 616 and can neither admit nor deny the same.

617. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 617 and can neither admit nor deny the same.

618. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 618 and can neither admit nor deny the same.

619. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 619 and can neither admit nor deny the same.

620. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 620 and can neither admit nor deny the same.

621. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 621 and can neither admit nor deny the same.

622. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 622 and can neither admit nor deny the same.

623. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 623 and can neither admit nor deny the same.

624. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 624 and can neither admit nor deny the same.

625. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 625 and can neither admit nor deny the same.

626. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 626 and can neither admit nor deny the same.

627. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 627 and can neither admit nor deny the same.

628. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 628 and can neither admit nor deny the same.

629. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 629 and can neither admit nor deny the same.

630. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 630 and can neither admit nor deny the same.

631. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 631 and can neither admit nor deny the same.

632. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 632 and can neither admit nor deny the same.

633. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 633 and can neither admit nor deny the same.

634. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 634 and can neither admit nor deny the same.

635. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 635 and can neither admit nor deny the same.

636. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 636 and can neither admit nor deny the same.

637. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 637 and can neither admit nor deny the same.

638. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 638 and can neither admit nor deny the same.

639. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 639 and can neither admit nor deny the same.

640. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 640 and can neither admit nor deny the same.

641. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 641 and can neither admit nor deny the same.

642. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 642 and can neither admit nor deny the same.

643. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 643 and can neither admit nor deny the same.

644. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 644 and can neither admit nor deny the same.

645. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 645 and can neither admit nor deny the same.

646. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 646 and can neither admit nor deny the same.

647. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 647 and can neither admit nor deny the same.

648. Denied.

649. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 649 and can neither admit nor deny the same.

650. Noramco denies the allegations in the final sentence of Paragraph 650. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 650 and can neither admit nor deny the same.

651. Denied.

652. The allegations in Paragraph 652 call for a legal conclusion to which no response is required.

653. The allegations in Paragraph 653 call for a legal conclusion to which no response is required.

654. Denied.

655. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 655 and can neither admit nor deny the same.

656. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 656 and can neither admit nor deny the same.

657. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 657 and can neither admit nor deny the same.

658. Noramco denies the allegations in the first sentence of Paragraph 658. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 658 and can neither admit nor deny the same.

659. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 659 and can neither admit nor deny the same.

660. Noramco denies the allegations in the first sentence of Paragraph 660. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 660 and can neither admit nor deny the same.

661. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 661 and can neither admit nor deny the same.

662. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 662 and can neither admit nor deny the same.

663. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 663 and can neither admit nor deny the same.

664. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 664 and can neither admit nor deny the same.

665. Denied.

666. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 666 and can neither admit nor deny the same.

667. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 667 and can neither admit nor deny the same.

668. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 668 and can neither admit nor deny the same.

669. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 669 and can neither admit nor deny the same.

670. Denied.

671. Noramco denies the allegations in the first and second sentences of Paragraph 671 because it does not sell its active pharmaceutical ingredients to consumers and those active pharmaceutical ingredients are not prescribed by physicians or the healthcare community. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in the first and second sentences of Paragraph 671 and can neither admit nor deny the same. The third sentence of Paragraph 671 calls for a legal conclusion to which no response is required.

672. Denied.

673. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 673 and can neither admit nor deny the same.

674. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 674 and can neither admit nor deny the same.

675. Noramco denies the allegations in the first sentence of Paragraph 675. As to the allegations in the second sentence of Paragraph 675, Noramco is without knowledge or information sufficient to form a belief as to the truth of those allegations and can neither admit nor deny the same.

676. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 676 and can neither admit nor deny the same.

677. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 677 and can neither admit nor deny the same.

678. Noramco denies the allegations in the first sentence of Paragraph 678. As to the remaining allegations in this Paragraph, Noramco is without knowledge or information sufficient to form a belief as to the truth of those allegations and can neither admit nor deny the same.

679. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 679 and can neither admit nor deny the same.

680. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 680 and can neither admit nor deny the same.

681. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 681 and can neither admit nor deny the same.

682. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 682 and can neither admit nor deny the same.

683. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 683 and can neither admit nor deny the same.

684. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 684 and can neither admit nor deny the same.

685. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 685 and can neither admit nor deny the same.

686. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 686 and can neither admit nor deny the same.

687. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 687 and can neither admit nor deny the same.

688. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 688 and can neither admit nor deny the same.

689. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 689 and can neither admit nor deny the same.

690. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 690 and can neither admit nor deny the same.

691. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 691 and can neither admit nor deny the same.

692. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 692 and can neither admit nor deny the same.

693. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 693 and can neither admit nor deny the same.

694. Denied.

695. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 695 and can neither admit nor deny the same.

696. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 696 and can neither admit nor deny the same.

697. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 697 and can neither admit nor deny the same.

698. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 698 and can neither admit nor deny the same.

699. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 699 and can neither admit nor deny the same.

700. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 700 and can neither admit nor deny the same. Noramco specifically denies that it engaged in any that it engaged in any wrongful acts or omissions alleged in the Complaint or otherwise relating to this action.

701. Denied.

702. Denied

703. Denied.

704. Denied.

705. Denied.

706. Denied.

707. Denied.

708. Denied.

709. Noramco denies the allegations in the first sentence of Paragraph 709. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 709 and can neither admit nor deny the same.

710. Denied.

711. Noramco denies the allegations in the first sentence of Paragraph 711. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 711 and can neither admit nor deny the same.

712. Denied.

713. Denied.

714. Denied.

715. Denied.

716. Denied.

717. Denied.

718. Denied.

719. Denied.

720. Denied.

721. Denied.

722. Denied.

723. The allegations in Paragraph 723 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in Paragraph 723.

724. Denied.

725. Denied.

726. Denied.

727. Denied. Noramco specifically denies that it engaged in any wrongful conduct.

728. Denied.

729. Noramco admits only that the Court ordered the production of ARCOS data.

Except as thus stated, Noramco denies the allegations in Paragraph 729

730. Denied.

731. Denied.

732. Denied.

733. Denied.

734. Denied.

735. Denied.

736. Denied.

737. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 737 and can neither admit nor deny the same.

738. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 738 and can neither admit nor deny the same.

739. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 739 and can neither admit nor deny the same.

740. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 740 and can neither admit nor deny the same.

741. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 741 and can neither admit nor deny the same.

742. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 742 and can neither admit nor deny the same.

743. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 743 and can neither admit nor deny the same.

744. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 744 and can neither admit nor deny the same.

745. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 745 and can neither admit nor deny the same.

746. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 746 and can neither admit nor deny the same.

747. Denied.

748. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 748 and can neither admit nor deny the same.

749. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 749 and can neither admit nor deny the same.

750. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 750, including all subparagraphs, and can neither admit nor deny the same.

751. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 751 and can neither admit nor deny the same.

752. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 752 and can neither admit nor deny the same.

753. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 753 and can neither admit nor deny the same.

754. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 754 and can neither admit nor deny the same.

755. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 755 and can neither admit nor deny the same.

756. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 756, including all subparagraphs, and can neither admit nor deny the same.

757. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 757 and can neither admit nor deny the same.

758. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 758 and can neither admit nor deny the same.

759. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 759 and can neither admit nor deny the same.

760. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 760 and can neither admit nor deny the same.

761. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 761 and can neither admit nor deny the same.

762. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 762 and can neither admit nor deny the same.

763. Denied.

764. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

765. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

766. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

767. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

768. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

769. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

770. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

771. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

772. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

773. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

774. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

775. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

776. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

777. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

778. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

779. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph, including subparts a through q.

780. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

781. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

782. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

783. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph, including subparts a through f.

784. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

785. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

786. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

787. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

788. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

789. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

790. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

791. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

792. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

793. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

794. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

795. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

796. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

797. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

798. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

799. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

800. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

801. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

802. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

803. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

804. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

805. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

806. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

807. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

808. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

809. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

810. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

811. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

812. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

813. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

814. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

815. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

816. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

817. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

818. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

819. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

820. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

821. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

822. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

823. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

824. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

825. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

826. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

827. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

FIRST CLAIM FOR RELIEF

**Violation of RICO, 18 U.S.C. § 1961 et seq.—Opioid Marketing Enterprise
(Against Defendants Purdue, Cephalon, Janssen, Endo, and Mallinckrodt (the “RICO
Marketing Defendants”))**

828. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

829. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

830. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

831. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

832. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

833. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

834. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

835. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

836. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

837. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

838. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

839. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

840. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

841. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

842. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

843. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

844. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

845. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

846. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

847. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

848. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

849. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

850. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

851. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

852. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

853. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

854. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

855. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph, including all subparagraphs. Noramco specifically denies that Plaintiff is entitled to any relief from Noramco in connection with this action.

SECOND CLAIM FOR RELIEF

Violation of RICO, 18 U.S.C. § 1961 et seq.—Opioid Supply Chain Enterprise (Against Defendants Purdue, Cephalon, Endo, Mallinckrodt, Actavis, McKesson, Cardinal, and AmerisourceBergen—“RICO Supply Chain Defendants”)

856. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

857. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

858. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

859. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

860. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

861. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

862. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

863. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

864. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

865. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

866. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

867. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

868. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

869. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

870. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

871. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

872. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

873. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

874. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

875. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

876. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

877. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

878. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

879. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

880. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

881. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

882. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

883. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

884. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

885. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

886. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

887. The allegations in this Paragraph are not addressed to Noramco, and Noramco therefore is not required to respond to such allegations. To the extent these allegations are addressed to Noramco, Noramco denies the allegations in this Paragraph.

THIRD CLAIM FOR RELIEF

**Public Nuisance
Federal Common Law
(Against all Defendants)**

888. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

889. The allegations in Paragraph 889 call for a legal conclusion to which no response is required.

890. The allegations in Paragraph 890 call for a legal conclusion to which no response is required.

891. The allegations in Paragraph 891 call for a legal conclusion to which no response is required.

892. Denied.

893. Denied.

894. Denied.

895. Denied.

896. Noramco denies the allegations in the first and final sentences of Paragraph 896. Except as thus stated, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 896.

897. The allegations in Paragraph 897 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in Paragraph 897.

898. Denied.

899. Denied.

900. Denied, including all subparagraphs.

901. Denied.

902. Denied.

903. Denied.

904. Denied.

905. Denied.

906. Denied.

907. Denied.

908. Denied.

909. Denied.

910. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 910. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 910.

911. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 911. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 911.

912. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 912. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 912.

FOURTH CLAIM FOR RELIEF

**State Common Law Public Nuisance
(Against All Defendants)**

913. Denied.

914. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

915. Denied.

916. The allegations in Paragraph 916 call for a legal conclusion to which no response is required.

917. Denied.

918. The allegations in the first sentence of Paragraph 918 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 918.

919. Denied.

920. The allegations in Paragraph 920 call for a legal conclusion to which no response is required.

921. The allegations in Paragraph 921 call for a legal conclusion to which no response is required.

922. Denied.

923. Denied.

924. Denied.

925. Denied.

926. Denied.

927. Denied, including all subparagraphs.

928. Denied, including all subparagraphs.

929. Denied.

930. Denied.

931. The allegations in the final sentence of Paragraph 931 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 931.

932. Denied, including all subparagraphs.

933. Denied, including all subparagraphs.

934. Denied.

935. Denied.

936. Denied.

937. Denied.

938. Denied.

939. Denied.

940. Denied.

941. Denied.

942. Denied.

943. Denied.

944. Denied.

945. Denied.

946. Denied.

947. Denied.

948. Denied.

949. Denied.

950. Denied.

951. Denied.

952. Noramco admits only that Plaintiff purports to bring this action seeking to abate a nuisance allegedly created by Defendants' actions or omissions. Noramco specifically denies that it engaged in any wrongful conduct. Noramco further denies that Plaintiff is entitled to any relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 952.

953. Denied.

954. Denied.

955. Denied.

956. Denied.

957. Denied.

958. Denied.

959. Denied.

960. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 960. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 960.

FIFTH CLAIM FOR RELIEF

**Statutory Public Nuisance
(Against All Defendants)**

961. Denied.

962. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

963. The allegations in Paragraph 963 call for a legal conclusion to which no response is required.

964. The allegations in Paragraph 964 call for a legal conclusion to which no response is required.

965. The allegations in Paragraph 965 call for a legal conclusion to which no response is required.

966. Noramco admits that Plaintiff purports to bring a public nuisance claim as specified in this Paragraph. Noramco specifically denies that Plaintiff is entitled to any relief from Noramco under the claim described in Paragraph 966 or under any other claim for relief in the Complaint. Except as thus stated, Noramco denies the allegations in Paragraph 966.

967. Denied.

968. Denied.

969. Denied.

970. Denied.

971. Denied.

972. Denied.

973. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 973. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 973.

974. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 974. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 974.

SIXTH CLAIM FOR RELIEF

Negligence and Negligent Misrepresentation (Against All Defendants)

975. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

976. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 976. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 976.

977. The allegations in the first sentence of Paragraph 977 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 977.

978. The allegations in Paragraph 978 call for a legal conclusion to which no response is required.

979. The allegations in Paragraph 979 call for a legal conclusion to which no response is required.

980. The allegations in Paragraph 980 call for a legal conclusion to which no response is required.

981. The allegations in the first sentence of Paragraph 981 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 981.

982. Denied.

983. Denied.

984. Denied.

985. Denied.

986. Denied.

987. Denied.

988. Denied, including all subparagraphs.

989. Denied.

990. Denied.

991. Denied.

992. Denied.

993. Denied.

994. Denied.

995. Denied.

996. Denied.

997. Denied.

998. Denied.

999. Denied.

1000. Denied.

1001. Denied.

1002. Denied.

1003. Denied.

1004. Denied.

1005. Denied.

1006. Denied.

1007. Denied.

1008. The allegations in Paragraph 1008 call for a legal conclusion to which no response is required.

1009. The allegations in Paragraph 1009 call for a legal conclusion to which no response is required.

1010. The allegations in Paragraph 1010 call for a legal conclusion to which no response is required.

1011. The allegations in Paragraph 1011 call for a legal conclusion to which no response is required.

1012. The allegations in Paragraph 1012 call for a legal conclusion to which no response is required.

1013. Denied.

1014. Denied.

1015. The allegations in Paragraph 1015 call for a legal conclusion to which no response is required.

1016. The allegations in the first sentence of Paragraph 1016 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 1016.

1017. Denied.

1018. Denied.

1019. The allegations in the second sentence of Paragraph 1019 call for a legal conclusion to which no response is required. Except as thus stated, Noramco denies the allegations in Paragraph 1019.

1020. Denied.

1021. Denied.

1022. Denied, including all subparagraphs.

1023. Denied.

1024. Denied.

1025. Denied.

1026. Denied.

1027. Denied.

1028. Denied.

1029. Denied.

1030. The allegations in Paragraph 1030 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco denies the allegations in this Paragraph.

1031. Denied.

1032. Denied.

1033. Denied.

1034. Denied.

1035. Denied.

1036. Denied.

1037. The allegations in Paragraph 1037 call for a legal conclusion to which no response is required.

1038. Denied.

1039. Denied.

1040. Denied.

1041. Denied.

1042. Denied.

1043. Denied.

1044. Denied.

1045. Denied.

1046. Denied.

1047. Denied.

1048. Denied.

1049. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1049. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1049.

1050. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1050. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1050.

SEVENTH CLAIM FOR RELIEF

Common Law Fraud (Against the Marketing Defendants)

1051. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1052. Denied.

1053. Denied.

1054. Denied, including subparagraphs (a) through (w).

1055. Denied, including subparagraphs (a) through (m).

1056. Denied.

1057. Denied.

1058. Denied.

1059. Denied.

1060. Denied.

1061. Denied.

1062. Denied.

1063. Denied.

1064. Denied.

1065. Denied.

1066. Denied.

1067. Denied.

1068. Denied.

1069. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1069. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1069.

EIGHTH CLAIM FOR RELIEF

Unjust Enrichment (Against All Defendants)

1070. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1071. Denied.

1072. Denied.

1073. The allegations in Paragraph 1073 call for a legal conclusion to which no response is required.

1074. Denied.

1075. Denied.

1076. Denied.

1077. Denied.

1078. Denied.

1079. Denied.

1080. Denied.

1081. Denied.

1082. Denied.

1083. Denied.

1084. Denied.

1085. Denied.

1086. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1086. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1086.

NINTH CLAIM FOR RELIEF

Civil Conspiracy (Against All Defendants)

1087. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1088. Denied.

1089. Denied.

1090. Denied.

1091. Denied.

1092. Denied.

1093. Denied.

1094. Denied.

1095. Denied.

1096. Denied.

1097. Denied.

1098. Denied.

1099. Denied.

1100. Denied.

1101. Denied.

1102. Denied.

1103. Denied.

1104. Denied.

1105. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1105. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1105.

1106. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1106. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1106.

1107.

TENTH CLAIM FOR RELIEF

**Violations of Montana Unfair Trade Practices and Consumer Protection Act, MCA § 30-14-101, et seq.
(Against All Defendants)**

1108. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1109. The allegations in Paragraph 1108, including all subparts, call for a legal conclusion to which no response is required.

1110. Denied.

1111. Denied.

1112. Denied.

1113. Denied, including all subparagraphs.

1114. Denied.

1115. Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence of Paragraph 1114. Except as thus stated, Noramco denies the allegations in Paragraph 1114.

1116. The allegations in Paragraph 1115 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco is without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1115 and can neither admit nor deny the same.

1117. The allegations in Paragraph 1116 call for a legal conclusion to which no response is required. To the extent a response is required, Noramco is without knowledge or information

sufficient to form a belief as to the truth of the allegations in Paragraph 1116 and can neither admit nor deny the same.

1118. Denied.

1119. Denied, including all subparts.

1120. Noramco admits only that Plaintiff purports to seek the relief alleged in Paragraph 1119. Noramco specifically denies that Plaintiff is entitled to any sort of relief from Noramco in connection with this action. Except as thus stated, Noramco denies the allegations in Paragraph 1119.

PUNITIVE DAMAGES

1121. Noramco re-alleges and incorporates by reference each and every response set forth above as if fully set forth herein.

1122. Denied.

1123. Denied.

1124. Denied.

1125. Noramco denies that Plaintiff is entitled to any relief requested in the Prayer for Relief. Noramco further denies that Plaintiff is entitled to any relief whatsoever from Noramco in connection with this action.

Noramco specifically denies any allegations in Plaintiff's Complaint not specifically admitted to herein.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Noramco merely supplies active pharmaceutical ingredients to finished drug product manufacturers in compliance with applicable law and according to the specifications provided by those finished drug product manufacturers. Plaintiff's claims do not apply to Noramco because those claims are focused only on the allegedly wrongful marketing and distribution of prescription opioid drugs, which by definition are finished drug products in dosage forms intended to be used by patients, and lawfully available to patients only by prescription. *See, e.g.*, 21 U.S.C. § 353(b); 21 C.F.R. §§ 201.51, 206.3. In contrast, Noramco's active pharmaceutical ingredients cannot be sold lawfully for patient use, with or without a prescription. *See, e.g.*, 21 C.F.R. § 207.1. Noramco does not and never has had any involvement whatsoever in the manufacture, packaging, branding, marketing, promotion, or sale of finished drug products and thus has never engaged in the conduct that forms the sole basis of Plaintiff's claims.

THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred in whole or in part by the applicable statutes of limitations and/or repose, including but not limited to, the four-year statute of limitations for civil RICO claims, the two-year statute of limitations for claims based on fraud, and the three-year statute of limitations for claims of negligence, unjust enrichment, civil conspiracy (other than based on fraud), and nuisance damages. *See, e.g.*, M.R. Civ. P. 8(C); *Agency Holding Corp. v.*

Malley-Duff & Associates, Inc., 483 U.S. 143, 156 (1987) (civil RICO); *Osterman v. Sears, Roebuck & Co.*, 318 Mont. 342, 348-49 (2003) (fraud); *Bennet v. Dow Chem. Co.*, 220 Mont. 117, 120 (1986) (torts).

FOURTH AFFIRMATIVE DEFENSE

The United States Food and Drug Administration and/or the United States Drug Enforcement Administration have primary jurisdiction to accord the relief Plaintiff seeks, especially with respect to Plaintiff's requests for injunctive relief in the form of corrective communication, actions, and programs; accordingly, the Court should defer this matter to those federal agencies.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are preempted, in whole or in part, by federal law, including the Federal Food, Drug, and Cosmetic Act (and related regulations) and the Controlled Substances Act (and related regulations). *See, e.g., Mutual Pharm. Co. v. Bartlett*, 570 U.S. 472 (2013); *Buckman Co. v. Pls.' Legal Comm.*, 531 U.S. 341 (2011); *Geier v. Am. Honda Co.*, 529 U.S. 861 (2000).

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, or in whole or in part, by the doctrine of laches. *See, e.g., Mont. Code Ann. § 1-3-218; Filler v. Richland County*, 247 Mont. 285, 290-91 (1991).

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff waived its claims against Noramco by failing to file them during the many years when Plaintiff knew or should have known about such claims. M.R. Civ. P. 8(C).

EIGHTH AFFIRMATIVE DEFENSE

The imposition of injunctive relief, civil penalties, or other remedies would be inequitable.

NINTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the doctrine of unclean hands. *See, e.g., Kauffman-Harmon v. Kauffman*, 307 Mont. 45 (2001).

TENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by estoppel. *See* M.R. Civ. P. 8(C).

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by res judicata and collateral estoppel.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the learned intermediary doctrine. *See, e.g., Stevens v. Novartis Pharm. Corp.*, 358 Mont. 474, 491–96 (2010); *Hill v. Squibb & Sons, E.R.*, 181 Mont. 199, 206-07 (1979).

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the component part supplier doctrine. *See, e.g.,* Restatement (Second) of Torts § 402A, Comment p.

FOURTEENTH AFFIRMATIVE DEFENSE

Noramco is a supplier of active pharmaceutical ingredients and has never had any involvement whatsoever in the in the manufacture, packaging, branding, marketing, promotion, or sale of finished drug products. Even if Noramco participated in such conduct, Plaintiff's claims

against Noramco are barred, in whole or in part, by the sophisticated or knowledgeable user doctrine. *See Jacobson v. Colo. Fuel & Iron Corp.*, 409 F.2d 1263, 1273 (9th Cir. 1969).

FIFTEENTH AFFIRMATIVE DEFENSE

Noramco is a supplier of active pharmaceutical ingredients and has never had any involvement whatsoever in the manufacture, packaging, branding, marketing, promotion, or sale of finished drug products. Even if Noramco participated in such conduct, Plaintiff's claims against Noramco are barred, in whole or in part, by informed consent. *See Negaard v. Feda's Estate*, 152 Mont. 47, 54-56 (1968), *overruled on other grounds by Burlingham v. Mintz*, 270 Mont. 277, 280 (1995).

SIXTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the unforeseeable alteration, modification, or misuse by Plaintiff or third parties of any products at issue. *See, e.g.*, Mont. Code Ann. 27-1-719(2)(b); *see also Barich v. Ottenstor*, 170 Mont. 38, 43 (1976).

SEVENTEENTH AFFIRMATIVE DEFENSE

Plaintiff has failed to join one or more necessary and indispensable parties, including, without limitation, health care providers, prescribers, patients, manufacturers, distributors, pharmacies, payors, government entities, and other third parties whom Plaintiff alleges engaged in the unauthorized or illicit prescription, dispensing, diversion, or use of prescription opioid finished drug products. *See M.R. Civ. P. 12(h), 19(a)*.

EIGHTEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are not properly joined with Plaintiff's claims against the other defendants because the claims do not arise out of the same alleged actions or omissions by all defendants in the case.

NINETEENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred because Noramco did not owe any legal duty to Plaintiff, or if Noramco owed any such legal duty, Noramco did not breach that duty.

TWENTIETH AFFIRMATIVE DEFENSE

Plaintiff's fraud claims against Noramco are barred because Plaintiff fails to allege any material misrepresentation made by Noramco.

TWENTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff fails to plead any claim with the requisite specificity, including fraud.

TWENTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims are barred to the extent they rely on conduct by third parties over which Noramco had no control or authority. The imposition of liability based on such third-party conduct would violate Noramco's rights under the Fourteenth Amendment to the United States Constitution and Article II, Sections 1, 3, 4, 17, and 29 of the Montana Constitution.

TWENTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco and/or requests for relief from Noramco are barred because Noramco's conduct was not the legal or proximate cause of Plaintiff's alleged injuries or damages.

TWENTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's injuries, if any, were the result of intervening or superseding events or conditions, including third-party conduct, which were not reasonably foreseeable and for which Noramco is not liable.

TWENTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, because the alleged injuries allege were the result of one or more criminal acts by third parties.

TWENTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred or limited by the economic loss doctrine, municipal cost recovery rule, and free public services doctrine.

TWENTY-SEVENTH AFFIRMATIVE DEFENSE

In the unlikely event that Noramco is found liable to Plaintiff, Noramco is entitled to a credit or offset for any and all sums that Plaintiff has received, or may hereafter receive, by way of any and all settlements or judgments arising from Plaintiff's claims.

TWENTY-EIGHTH AFFIRMATIVE DEFENSE

Any verdict or judgment that might be recovered by Plaintiff must be reduced by those amounts that have already or will in the future, with reasonable certainty, indemnify or otherwise reimburse Plaintiff from a collateral source for any part of any economic loss, or by any portion of the asserted damages that were in fact borne by third parties. Mont. Code Ann. §§ 27-1-306, 27-1-307.

TWENTY-NINTH AFFIRMATIVE DEFENSE

To the extent Plaintiff sustained any injuries or incurred any expenses as alleged in the Complaint, Plaintiff and/or parties or entities other than Noramco, over which Noramco has no supervision or control and for whose actions Noramco has no responsibility, are responsible for at least 51 percent of any tortious conduct. Noramco therefore is only severally liable, if at all, for economic and non-economic injuries or expenses. Mont. Code Ann. §§ 27-1-703, 27-1-705.

THIRTIETH AFFIRMATIVE DEFENSE

Any damages must be reduced by the proportion of Plaintiff's culpable conduct that caused the damages. Mont. Code Ann. § 27-1-702.

THIRTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by Plaintiff's failure to mitigate any damages allegedly sustained.

THIRTY-SECOND AFFIRMATIVE DEFENSE

To the extent Plaintiff seeks relief for Noramco conduct that was not actionable at the time it occurred, Plaintiff's claims are barred because they violate Noramco's due process rights under the Fourteenth Amendment to the United States Constitution and Article II, Sections 1, 3, 4, 17, and 29 of the Montana Constitution and Noramco's right to be free from retroactive or ex post facto laws as guaranteed by Article I, Section 10 of the United States Constitution.

THIRTY-THIRD AFFIRMATIVE DEFENSE

Any damages or injury to Plaintiff must be set off against the benefits to Plaintiff as a result of Noramco's lawful activity and the net benefits bar any claims against Noramco.

THIRTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's unjust enrichment claim against Noramco is barred because Plaintiff does not allege that Noramco wrongfully obtained a benefit from Plaintiff.

THIRTY-FIFTH AFFIRMATIVE DEFENSE

Any financial or other arrangement that might distort a government attorney's duty to pursue justice rather than his or her personal interests, including Plaintiff's use of private contingency-fee counsel in this action, violates Noramco's rights under the Due Process Clause of the United States Constitution.

THIRTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, because the application of Montana law to conduct in other states or countries would violate the Dormant Commerce Clause of the United States Constitution. *See, e.g., Daniels Sharpsmart, Inc. v. Smith*, 889 F.3d 608, 615 (9th Cir. 2018).

THIRTY-SEVENTH AFFIRMATIVE DEFENSE

The imposition of civil monetary penalties in this action would violate the Excessive Fines Clause of the Eighth Amendment of the United States Constitution and Article II, Section 22 of the Montana Constitution. *See United States v. Bajakajian*, 524 U.S. 321, 334 (1998).

THIRTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's request for civil monetary penalties and punitive damages is barred, in whole or in part, by the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution and Article II, Section 22 of the Montana Constitution.

THIRTY-NINTH AFFIRMATIVE DEFENSE

In the unlikely event that Noramco is found liable to Plaintiff, any punitive damages award may only be awarded after consideration of any and all punitive damages awards in other cases involving the same acts or course of conduct. Mont. Code Ann. § 27-1-221.

FORTIETH AFFIRMATIVE DEFENSE

In the unlikely event that Noramco is found liable to Plaintiff, any punitive damages award may not exceed the lesser of \$10 million or 3% of Noramco's net worth. Mont. Code Ann. § 27-1-220.

FORTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred and/or reduced by assumption of risk, contributory or comparative negligence, contributory or comparative fault, proportionate responsibility, and coming to the nuisance.

FORTY-SECOND AFFIRMATIVE DEFENSE

The conduct at issue may solely be the result of an obligation imposed by law, and thus Noramco is entitled to complete indemnity, express or implied, by other parties.

FORTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco and any damages are barred or limited, in whole or in part, by common law, statutory, and state constitutional constraints on the exercise of police powers by a state, county, municipality, or other entity.

FORTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred for lack of standing; Plaintiff has no *parens patriae* or other authority to bring the claims alleged.

FORTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's alleged damages are too speculative and remote to serve as a legal basis for any recovery.

FORTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff is barred from any recovery of attorney's fees under any applicable provisions of law, including but not limited to Section 25-10-301 of the Montana Rules of Civil Procedure.

FORTY-SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by Plaintiff's failure to comply with the requirement that it identify each patient in whose claim(s) Plaintiff has a subrogation interest.

FORTY-EIGHTH AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred under the constitutional principles of separation of powers.

FORTY-NINTH AFFIRMATIVE DEFENSE

The legal rules underlying Plaintiff's claims against Noramco, including but not limited to the public nuisance standard and the Racketeering Influenced and Corrupt Organizations Act, are unconstitutionally vague. *See, e.g., F.C.C. v. Fox Television Stations, Inc.*, 567 U.S. 239 (2012).

FIFTIETH AFFIRMATIVE DEFENSE

Noramco is a supplier of active pharmaceutical ingredients and has never had any involvement whatsoever in the in the manufacture, packaging, branding, marketing, promotion, or sale of finished drug products. Even if Noramco participated in such conduct, any claim that Noramco failed to sufficiently warn consumers of risks associated with its products is barred on

the grounds that such a risk was well-known and readily apparent to prescribing physicians. *See, e.g.,* Mont. Code Ann. § 27-1-719; *Jackson v. Coast Paint & Lacquer Co.*, 499 F.2d 809, 811–12 (9th Cir. 1974); Restatement (Second) of Torts § 402A, Comment j.

FIFTY-FIRST AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, because Noramco used standards, methods, and techniques that conformed to the generally recognized state of the art at the time the products at issue were designed, manufactured, and distributed.

FIFTY-SECOND AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the unavoidable risk rule of the Restatement (Second) of Torts § 402A, Comment k.

FIFTY-THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims against Noramco are barred, in whole or in part, by the derivative injury rule and the remoteness doctrine, which bar Plaintiff from recovering any payments that Plaintiff allegedly made on behalf of residents to reimburse any expenses for health care, pharmaceutical care, and other public services.

FIFTY-FOURTH AFFIRMATIVE DEFENSE

Plaintiff's public nuisance claims are barred because the alleged public nuisances have impermissibly extraterritorial reach and because Plaintiff does not allege that Noramco's actions resulted in an unreasonable interference with a right common to the general public.

FIFTY-FIFTH AFFIRMATIVE DEFENSE

Plaintiff's damages are subject to applicable statutory and common law limitations. *See, e.g.,* Mont. Code Ann. § 27-1-302.

FIFTY-SIXTH AFFIRMATIVE DEFENSE

Plaintiff has not sufficiently alleged a basis for personal jurisdiction over Noramco. While Plaintiff alleges generally that all Defendants engaged in certain actions supporting the exercise of personal jurisdiction, Plaintiff does not allege: (1) that Noramco specifically engaged in any conduct that would support the exercise of personal jurisdiction under the Montana long-arm statute or (2) that Noramco specifically has any forum contacts as necessary to support the exercise of general jurisdiction or specific jurisdiction under the Due Process Clause of the United States Constitution.

FIFTY-SEVENTH AFFIRMATIVE DEFENSE

Noramco expressly reserves the right to assert additional separate defenses as to which it currently lacks sufficient knowledge or information in the event that discovery indicates that such defenses would be appropriate.

JURY TRIAL DEMAND

Noramco hereby demands a trial by jury on all issues so triable.

Dated: July 26, 2019

Respectfully submitted,

/s/ Jenny A. Hergenrother

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CERTIFICATE OF SERVICE

I hereby certify that on this date, a copy of the foregoing **Defendant Noramco, Inc.’s Answer to Plaintiff’s Corrected First Amended Complaint, Affirmative Defenses, and Jury Demand** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

Dated: July 26, 2019

/s/Jenny A. Hergenrother
Jenny A. Hergenrother